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**ECONOMICS, MORTGAGE FINANCE,
& HOUSING POLICY DIVISION**

DAVID F. SEIDERS, Ph.D

Chief Economist
Senior Staff Vice President

July 5, 2000

John H. Thompson
Associate Director for Decennial Census
Bureau of the Census, Building 2, Room 3586
Suitland and Silver Hill Roads
Suitland, Maryland 20233

Re: Comment letter regarding Secretary of Commerce's proposed rule

Dear Mr. Thompson:

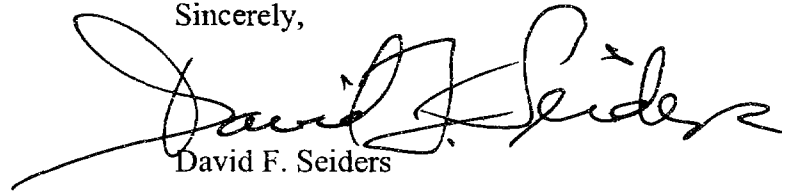
I am writing in response to the "Request for Comments on the Proposed Rule" published in the Federal Register on June 20, 2000, by the Secretary of Commerce regarding the procedure for release of the corrected data file for Census 2000. The Secretary of Commerce has wisely determined that the best people to make such a decision are at the Census Bureau. The proposed rule delegates to the Director the authority to make the decision on the release of the corrected data after receiving a report from a team of statistical experts from the Bureau. This team is made up of researchers and scientists who have spent years doing research on the use of statistical methods to increase the accuracy of the Census.

Since 1940 when the undercount was first measured, the Census has systematically missed minorities and poor people at a far higher rate than the population as a whole. Such a bias in the constitutionally-mandated enumeration is an intolerable condition which the Census Bureau has worked for decades to overcome. A procedure called Dual Systems Estimation (DSE) can compare a scientifically drawn sample of the population with the direct results from the Census to produce more accurate and reliable population data. Such a process is now being implemented by the Bureau with advice from the National Academy of Sciences and other statistical experts.

The proposed procedure for delegating the decision on the release of the corrected data for Census 2000 to the Director of the Census Bureau, upon the recommendation of the professional staff, removes the hands of politics from what should be a scientific decision. The Director of the Census Bureau has set forth in his Statement on the Feasibility of Using Statistical Methods to Improve the Accuracy of Census 2000 (which accompanied this "Request for Comments on the Proposed Rule") the critical factors to be considered by the Census Bureau in determining whether the corrected data most accurately reflects the U.S. population. If the statistical experts at the Bureau are satisfied that criteria's are met, then the decision to issue the corrected data can be made as a matter of course.

The National Association of Home Builders heartily supports the Secretary of Commerce in his proposal to set forth a fair and unbiased procedure for making such a vital decision, and NAHB urges final adoption of the rule.

Sincerely,

A handwritten signature in black ink, appearing to read "David F. Seiders". The signature is fluid and cursive, with a large initial "D" and "S".

David F. Seiders